It has been said that one who deals with an infant does so at one's peril. See *Alvey* v. *Reed* (1888) 115 Ind. 148, 149, 17 N. E. 265. Since the policy of the law is to protect infants, rights acquired by them under more advantageous contracts should be similarly protected.

LIBEL AND SLANDER—PRIVILEGED COMMUNICATION OVERHEARD BY THIRD PERSON.—The plaintiff, a discharged employee, was called into the office of the defendant corporation's manager, where, during a discussion regarding the plaintiff's accounts, he was called a "damn thief." The words, spoken in a loud voice were overheard by clerks in the outer office. *Held,* a directed verdict for the defendant was correct. *McKenzie* v. *Burns Internat'l Detective Agency, Inc.* (Minn. 1921) 183 N. W. 516.

A privileged communication does not lose its character merely because overheard by a third party. *Conrad* v. *Roberts* (1915) 95 Kan. 180, 147 Pac. 795. The defendant should not, however, select an occasion when there are many present. See Odgers, *Libel and Slander* (5th ed. 1911) 300. He cannot invite any outsider to be present. *Parsons* v. *Surgey* (1864) 4 F. &. F. 247. The theory of these cases is that the defendant's privilege depends on his good faith; if he so acts, the presence of third parties is immaterial. See *Toogood* v. *Spyring* (1834) 1 C. M. & R. *181, *193 *et seq.* If the defendant makes his statement in a semi-public place, and in a loud tone of voice, it becomes a jury question to determine whether the publication is made in good faith. *Kruse* v. *Rabe* (1910) 80 N. J. L. 378, 79 Atl. 316. In the instant case, the shouting of a slanderous statement in a voice audible in an office known to the defendant to be open to the public, was a fact from which the jury might infer malice destroying the defendant's privilege. Yet the court directed a verdict for the defendant. The rule as laid down in the *Kruse* case, *supra,* would have permitted the plaintiff to go to the jury. That rule allows for the necessities of business while it properly restricts the publishing of slanderous statements, and it is unfortunate that the court in the instant case did not apply it.

MASTER AND SERVANT—COMPULSORY PILOTAGE DEFENSE—LIMITATIONS.—The defendant's steamer, under compulsory pilotage, collided with the plaintiff's vessel. The pilot was negligent, but the master and crew were also negligent in not reporting the presence of the plaintiff's vessel. *Held,* the defense of compulsory pilotage could not be maintained. *Owners of S. S. Alexander Shukoff* v. *Owners of S. S. Gothland* (1921) 124 L. T. R. (N. S.) 355.

The owners of a vessel in charge of a pilot whom they are compelled to accept by law, are not responsible for injuries caused by the pilot's negligence. *Homer Ramsdell Trans. Co.* v. *Compagnie Generale Transatlantique* (C. C. 1894) 63 Fed. 845. But the master and crew must give the pilot the fullest assistance. See *The Tactician* [1907] P. 244, 250. And where the crew and master have also been in fault the negligence of the pilot is no defense. See *The Christiana* (1850) 7 Moore P. C. 160, 171. Thus, the vessel is liable where there is interference with the pilot if it is not a case of extreme necessity. *The Lochlibo* (1850) 3 W. Rob. Adm. 310. Also where lights are shown contrary to statute, even if by the pilot's order. *The Ripon* [1885] P. 65. Or where sails are improperly set. *The Christiana, supra.* When the pilot fails to notice dangers which a competent mariner would notice, it is the master's duty to warn him. *The Tactician, supra.* But it is his duty to warn only when the danger is obvious and imminent. *The Ape* (1915) [1916] P. 303. In pleading the defense of compulsory pilotage the burden is on the defendant to prove the pilot was solely at fault. *The Benue* [1916] P. 88. In this country also, the owners are liable un-